



**ROBINSON MCFADDEN**

ATTORNEYS AND COUNSELORS AT LAW

ROBINSON, MCFADDEN & MOORE, P.C.

COLUMBIA, SOUTH CAROLINA

August 13, 2009

**VIA ELECTRONIC FILING**

Mr. Charles Terreni  
Chief Clerk of the Commission  
Public Service Commission of South Carolina  
Synergy Business Park, Saluda Building  
101 Executive Center Drive  
Columbia, SC 29210

**Bonnie D. Shealy**

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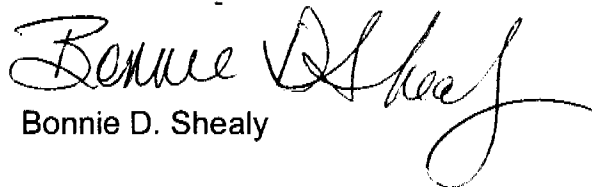
**Re: State Universal Service Support of Basic Local Service Included in a  
Bundled Service Offering or Contract Offering  
Docket No. 2009-326-C**

Dear Mr. Terrini:

Enclosed for filing please find the Discovery Requests to the Office of Regulatory Staff and Requests to Carriers of Last Resort on behalf of South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and NuVox Communications, Incorporated. By copy of this letter we are serving the same on all parties of record.

Yours truly,

ROBINSON, MCFADDEN & MOORE, P.C.

  
Bonnie D. Shealy

/bds  
enclosure

cc/enc: Parties of record (via email and U.S. Mail)  
David Butler, Hearing Examiner (via email and US Mail)  
John J. Pringle, Jr., Esquire (via email)  
Mr. Ray Sharpe (via email)  
Ms. Carolyn Ridley (via email)  
Ms. Susan Berlin (via email)

**BEFORE**  
**THE PUBLIC SERVICE COMMISSION OF**  
**SOUTH CAROLINA**  
**DOCKET NO. 2009-326-C**

IN RE:	)	
	)	
	)	<b>SOUTH CAROLINA CABLE</b>
	)	<b>TELEVISION ASSOCIATION,</b>
State Universal Service Support of Basic	)	<b>COMPSOUTH, tw telecom of south</b>
Local Service Included in a Bundled	)	<b>carolina llc, AND NUVOX</b>
Service Offering or Contract Offering	)	<b>COMMUNICATIONS INCORPORATED</b>
	)	<b>DISCOVERY REQUESTS TO OFFICE</b>
	)	<b>OF REGULATORY STAFF</b>
	)	
	)	

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TO: NANETTE S. EDWARDS, ESQUIRE, ATTORNEY FOR OFFICE OF  
REGULATORY STAFF:

Pursuant to 26 S.C. Regs. 103-833 and other applicable rules of practice and procedure of the Public Service Commission of South Carolina ("Commission"), the South Carolina Cable Television Association, CompSouth, tw telecom of south carolina llc, and Nuvox Communications Incorporated (collectively "CLECs") request that the Office of Regulatory Staff ("ORS") respond to the following interrogatories and/or requests for production within twenty days of service:

**NO. 1-1**

Please provide copies of any and all documents submitted by the Carriers of Last Resort ("COLR") to ORS in regard to the COLRs' requests for distributions from the South Carolina Universal Service Fund for each of the years 2005 through the present. The requested documents include, but are not limited to, the *South*

*Carolina Annual Universal Service Fund ILEC Data Report and the South Carolina State USF Per Line Support Calculation.*

**NO. 1-2**

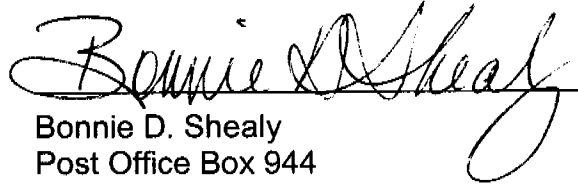
Please provide copies of any and all documents submitted by the Carriers of Last Resort ("COLR") to the Commission in regard to the COLRs' requests for distributions from the South Carolina Universal Service Fund for each of the years 2001 through 2005 which were physically transferred to ORS as a result of Order No. 2005-7 which designated ORS as the Administrator of the Fund. The requested documents include, but are not limited to, the *South Carolina Annual Universal Service Fund ILEC Data Report* and the *South Carolina State USF Per Line Support Calculation*.

**NO. 1-3**

Please provide a summary of the South Carolina Universal Service Fund Distributions to COLRs for each of the years 2001 through the present including the total annual amount of Universal Service Fund distributions provided to each COLR by year.

Dated this 13<sup>th</sup> day of August, 2009.

ROBINSON, MCFADDEN & MOORE, P.C.



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COUNSEL FOR SOUTH CAROLINA CABLE  
TELEVISION ASSOCIATION, COMPSOUTH AND tw  
telecom of south carolina llc

AND

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COUNSEL FOR NuVox COMMUNICATIONS  
INCORPORATED

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA**

**DOCKET NO. 2009-326-C**

IN RE:

State Universal Service Support of Basic  
Local Service Included in a Bundled  
Service Offering or Contract Offering

**CERTIFICATE OF SERVICE**

\_\_\_\_\_

This is to certify that I, Leslie Allen, a legal assistant with the law firm of Robinson, McFadden & Moore, P.C., have this day caused to be served upon the person(s) named below the **DISCOVERY REQUESTS TO OFFICE OF REGULATORY STAFF ON BEHALF OF THE SOUTH CAROLINA CABLE TELEVISION ASSOCIATION, COMPSOUTH, tw telecom of south carolina, llc, AND NUVOX COMMUNICATIONS INCORPORATED** in the foregoing matter by placing a copy of same in the United States Mail, postage prepaid, in an envelope addressed as follows:

Nanette S. Edwards, Esquire  
Office of Regulatory Staff  
Post Office Box 11263  
Columbia, SC 29211

Burnet R. Maybank, III, Esquire  
Nexsen Pruet, LLC  
PO Drawer 2426  
Columbia, SC 29202

Patrick W. Turner, Esquire  
BellSouth Telecommunications, Inc.  
Post Office Box 752  
Columbia, SC 29202

M. John Bowen, Jr., Esquire  
Margaret M. Fox, Esquire  
McNair Law Firm, P.A.  
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William R. L. Atkinson, Esquire  
Sprint Nextel Corporation  
233 Peachtree Street, N.E., Suite 2200  
Atlanta, GA 30303

Dated at Columbia, South Carolina this 13<sup>th</sup> day of August, 2009.

A handwritten signature in cursive script that reads "Leslie Allen". The signature is written in dark ink and is positioned above a horizontal line.

Leslie Allen